

The Honorable David G. Estudillo

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JENNIFER WYSOCKI, ANDREW SIDHU,  
BETSY KELLOGG, and KEISHA  
FLEMISTER, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

ZOOMINFO TECHNOLOGIES INC.,  
ZOOMINFO TECHNOLOGIES LLC,  
ZOOMINFO HOLDINGS LLC, and  
ZOOMINFO INTERMEDIATE INC.,

Defendants.

Case No. 3:22-cv-05453-DGE

DECLARATION OF ARAVIND  
SWAMINATHAN IN SUPPORT OF  
DEFENDANTS' MOTION FOR A  
PROTECTIVE ORDER STAYING  
DISCOVERY

I, Aravind Swaminathan, hereby declare:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel for Defendants ZoomInfo Technologies, Inc., ZoomInfo Technologies LLC, ZoomInfo Holdings LLC, and ZoomInfo Intermediate Inc., in this action. I have personal knowledge of the facts stated herein and, if called as a witness, would competently testify thereto.

2. On September 6, 2022, I emailed counsel for Plaintiffs regarding several issues

1 surrounding the scheduling of Defendants' then-forthcoming motions to dismiss and to strike.  
2 I proposed stipulating to stay discovery until 30 days after the Court rules on the Motion to  
3 Dismiss and Motion to Strike.

4 3. The next day, counsel for Plaintiffs, Radhika Gupta, responded that Plaintiffs  
5 would not agree to stay discovery while the motions are pending.

6 4. At the November 1, 2022, Rule 26(f) telephonic conference, counsel for  
7 Defendants advised Plaintiffs' counsel that Defendants planned to file a motion to stay  
8 discovery deadlines pending the outcome of the motions to dismiss and strike. Defendants  
9 inquired as to Plaintiffs' position on the motion. Counsel for Plaintiffs stated that they oppose  
10 the motion.

11 I declare under penalty of perjury under the laws of the United States that the foregoing  
12 is true and correct.

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15 Executed on November 2, 2022, at Seattle, Washington.

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18 By: s/Aravind Swaminathan

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